



FILED

12 MAY 25 PM 1:03

CLERK OF DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
LOS ANGELES

BY: \_\_\_\_\_

**KRONENBERGER ROSENFELD, LLP**

Karl S. Kronenberger (Bar No. 226112)  
Jeffrey M. Rosenfeld (Bar No. 222187)  
Virginia A. Sanderson (Bar No. 240241)  
150 Post Street, Suite 520  
San Francisco, CA 94108  
Telephone: (415) 955-1155  
Facsimile: (415) 955-1158  
karl@KRInternetLaw.com  
jeff@KRInternetLaw.com  
ginny@KRInternetLaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**CV12-04596-R(MAN)**

**NATIONAL PHOTO GROUP, LLC,**  
a limited liability company,

Plaintiff,

vs.

**REV NEW MEDIA, INC., and DOES  
1-10, inclusive,**

Defendants.

Case No.

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Case No.

**COMPLAINT**

KRONENBERGER ROSENFELD

150 Post Street, Suite 520, San Francisco, CA 94108



1 Plaintiff National Photo Group, LLC, by and through its undersigned  
2 counsel, states and alleges as follows:

### 3 INTRODUCTION

4 1. Plaintiff National Photo Group, LLC ("NPG" or "Plaintiff")  
5 provides entertainment-related photojournalism goods and services. In  
6 particular, NPG owns the rights to a multitude of photographs featuring  
7 celebrities, which it licenses to online and print publications. NPG's portfolio  
8 of celebrity photographs is the bread and butter of its business.

9 2. NPG has obtained U.S. copyright registrations covering many of  
10 its celebrity photographs, and others are the subject of pending copyright  
11 applications.

12 3. Defendant REV New Media, Inc. ("New Media") owns and  
13 operates a website dedicated to current events, including celebrity news.

14 4. Without permission or authorization from NPG, New Media  
15 copied, modified, and displayed NPG's celebrity photographs on New  
16 Media's website.

17 5. New Media engaged in this misconduct knowingly and in  
18 violation of the United States copyright laws.

19 6. NPG has been substantially harmed as a result of New Media's  
20 misconduct.

### 21 JURISDICTION AND VENUE

22 7. This Court has subject matter jurisdiction over the federal  
23 copyright infringement claims pursuant to 28 U.S.C. § 1338(a) and 28  
24 U.S.C. § 1331.

25 8. This Court has personal jurisdiction over New Media because it  
26 is located, and maintains its principal place of business, within California and  
27 this judicial district.



1 9. Venue is proper under 28 U.S.C. §1391(a)(2) because this is a  
 2 judicial district in which a substantial part of the events or omissions giving  
 3 rise to the claim occurred.

#### 4 **PARTIES**

5 10. NPG is a California limited liability company and maintains its  
 6 principal place of business in Los Angeles, California.

7 11. Upon information and belief, New Media is a California  
 8 corporation and maintains its principal place of business in Burbank,  
 9 California.

10 12. NPG does not know the true names and capacities, whether  
 11 individual, associate, corporate or otherwise, of Defendants sued herein as  
 12 Does 1-10 inclusive, and NPG therefore sues said Defendants by such  
 13 fictitious names.

14 13. NPG will amend this complaint to state the true names and  
 15 capacities of the Doe Defendants once they have been discovered. NPG is  
 16 informed and believes, and, on that basis, alleges that each Defendant sued  
 17 herein by a fictitious name is in some way liable and responsible to NPG  
 18 based on the facts herein alleged.

#### 19 **FACTUAL ALLEGATIONS**

##### 20 **NPG's Business**

21 14. NPG provides entertainment-related photojournalism goods and  
 22 services. In particular, NPG owns the rights to a multitude of photographs  
 23 featuring celebrities, which it licenses to online and print publications.

24 15. NPG has invested significant time and money in building its  
 25 celebrity photograph portfolio. Due to the quality of its celebrity  
 26 photographs, NPG has developed an impressive list of clients including  
 27 some of the most-recognized names in celebrity reporting ("NPG's Clients").

28 //



**NPG's Copyrights**

16. NPG has obtained U.S. copyright registrations covering many of its celebrity photographs.

17. NPG's celebrity photographs are original, creative works in which NPG owns protectable copyright interests.

18. NPG owns several active and valid copyright registrations with the United States Copyright Office (the "USCO"), which registrations cover NPG's celebrity photographs.

19. For example, on 2/21/2012, NPG obtained a copyright registration for a collection of celebrity photographs, USCO Registration No. VA-1-806-514 (the "Copyright"), which included a series of photographs of actor Drew Barrymore (the "Photographs").

**New Media's Website**

20. New Media is the registered owner of the website located at <hollyscoop.com> (the "Website"). On information and belief, New Media operates the Website and is responsible for all Website content.

21. The Website provides articles and other information about celebrity gossip and related events.

22. The Website is monetized in that it contains paid advertisements. On information and belief, New Media profits from these paid advertisements.

23. On information and belief, the Website averages approximately 400,000 unique visitors per month.

**New Media's Misconduct**

24. On or about February 21, 2012, New Media posted the Photographs on the Website in a post entitled "Drew Barrymore Holds a Sonogram. Is She Pregnant?"

//



1 25. On information and belief, New Media copied the Photographs  
 2 from the websites of NPG's Clients and reposted them on the Website  
 3 without license or permission, thereby infringing on the Copyright (the  
 4 "Infringement").

5 26. On information and belief, New Media engaged in the  
 6 Infringement knowingly and in violation of United States copyright laws.

7 27. On information and belief, New Media has received a financial  
 8 benefit directly attributable to the Infringement. Specifically, by way of the  
 9 Infringement, New Media increased traffic to the Website and, in turn, its  
 10 advertising revenues.

11 28. As a result of New Media's misconduct, NPG has been  
 12 substantially harmed.

### 13 CLAIM FOR RELIEF

#### 14 (Copyright Infringement, 17 U.S.C. § 501 et seq.)

15 29. NPG repeats and incorporates by reference the allegations  
 16 contained in the preceding paragraphs.

17 30. The Photographs are original, creative works in which NPG  
 18 owns protectable copyright interests.

19 31. NPG owns the copyright for the Photographs, USCO  
 20 Registration No. VA-1-806-514.

21 32. NPG has not licensed New Media or any of its websites to use  
 22 the Photographs in any manner, nor has NPG assigned any of its exclusive  
 23 rights in the Copyright to New Media.

24 33. Without permission or authorization from NPG, and in willful  
 25 violation of NPG's rights under 17 U.S.C. § 106, New Media reproduced the  
 26 Photographs.

27 //

28 //



1 34. On information and belief, without permission or authorization  
2 from NPG, and in willful violation of NPG's rights under 17 U.S.C. § 106,  
3 New Media displayed the Photographs on the Website.

4 35. New Media's reproduction of the Photographs and display of the  
5 Photographs on the Website constitute copyright infringement.

6 36. On information and belief, thousands of people have viewed the  
7 unlawful copies of the Photographs on the Website.

8 37. On information and belief, New Media had knowledge of the  
9 copyright infringement alleged herein and had the ability to stop the  
10 reproduction and display of NPG's copyrighted material.

11 38. New Media's copyright infringement has damaged NPG in an  
12 amount to be proven at trial.

### 13 PRAYER FOR RELIEF

14 **WHEREFORE**, NPG respectfully requests judgment as follows:  
15

16 1. That the Court enter a judgment finding that New Media has  
17 infringed on NPG's Copyrights in the Photographs in violation of 17 U.S.C. §  
18 501 et seq.;

19 2. That the Court award damages and monetary relief as follows:

- 20 a. Statutory damages against New Media pursuant to 17  
21 U.S.C. § 504(c) of \$150,000 per infringement or, in the  
22 alternative, NPG's actual damages and New Media's  
23 wrongful profits in an amount to be proven at trial;  
24 b. NPG's attorneys' fees pursuant to 17 U.S.C. § 505;  
25 c. NPG's costs; and

26 //

27 //

28 //



1 3. Such other relief that the Court determines is just and proper.

2  
3 Respectfully Submitted,

4 DATED: May 23, 2012

**KRONENBERGER ROSENFELD, LLP**

5  
6 By:   
7 Virginia A. Sanderson

8 Attorneys for Plaintiff

KRONENBERGER ROSENFELD

150 Post Street, Suite 520, San Francisco, CA 94108



**REQUEST FOR JURY TRIAL**

Plaintiff hereby demands a trial of this action by jury.

DATED: May 23, 2012

**KRONENBERGER ROSENFELD, LLP**

By:

  
Virginia A. Sanderson

Attorneys for Plaintiff

KRONENBERGER ROSENFELD



150 Post Street, Suite 520, San Francisco, CA 94108



**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Manuel Real and the assigned discovery Magistrate Judge is Margaret A. Nagle.

The case number on all documents filed with the Court should read as follows:

**CV12- 4596 R (MANx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

Unless otherwise ordered, the United States District Judge assigned to this case will hear and determine all discovery related motions.

===== :  
**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☒ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☐ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.



AO 440 (Rev. 12/09) Summons in a Civil Action

# UNITED STATES DISTRICT COURT

for the

Central District of California

NATIONAL PHOTO GROUP, LLC, a limited liability  
company,

*Plaintiff*

v.

REV NEW MEDIA, INC., and DOES 1-10, inclusive,

*Defendant*

)  
) **CV12-04596** R(MANx)  
)  
) Civil Action No.  
)  
)  
)

## SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* REV NEW MEDIA, INCORPORATED  
c/o RAYMOND PATRICK ATTIPA  
4161 LOS FELIZ BLVD #A2  
LOS ANGELES, CA 90027

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Virginia A. Sanderson  
KRONENBERGER ROSENFELD, LLP  
150 Post Street Suite 520  
San Francisco, CA 94108

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

MAY 25 2012

Date: \_\_\_\_\_

CLERK OF COURT

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> NATIONAL PHOTO GROUP, LLC, a limited liability company	<b>DEFENDANTS</b> REV NEW MEDIA, INC., and DOES 1-10, inclusive
<b>(b) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  Virginia Sanderson, KRONENBERGER ROSENFELD, LLP 150 Post Street, Suite 520 San Francisco, CA 94108, (415) 955-1155	<b>Attorneys (If Known)</b>

  

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:33%;">PTF DEF <input type="checkbox"/> 1   <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:33%;">PTF DEF <input type="checkbox"/> 4   <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2   <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5   <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3   <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6   <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF DEF <input type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF DEF <input type="checkbox"/> 4 <input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6
Citizen of This State	PTF DEF <input type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF DEF <input type="checkbox"/> 4 <input type="checkbox"/> 4										
Citizen of Another State	<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5										
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6										

  
**IV. ORIGIN** (Place an X in one box only.)  
☒ 1 Original Proceeding    
☐ 2 Removed from State Court    
☐ 3 Remanded from Appellate Court    
☐ 4 Reinstated or Reopened    
☐ 5 Transferred from another district (specify): \_\_\_\_\_    
☐ 6 Multi-District Litigation    
☐ 7 Appeal to District Judge from Magistrate Judge
   
  
**V. REQUESTED IN COMPLAINT: JURY DEMAND:** ☒ Yes   ☐ No (Check 'Yes' only if demanded in complaint.)  
**CLASS ACTION** under F.R.C.P. 23: ☐ Yes   ☒ No     **MONEY DEMANDED IN COMPLAINT: \$** \_\_\_\_\_
   
  
**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
 Copyright Infringement, 17 U.S.C. § 501 et seq
   
  
**VII. NATURE OF SUIT** (Place an X in one box only.)
 

<b>OTHER STATUTES</b> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE / PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROPERTY RIGHTS</b> <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
---	--	--	---	--	--

FOR OFFICE USE ONLY: Case Number: \_\_\_\_\_

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA**  
**CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes  
 If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes  
 If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.  
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.  
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.  
**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

**Note:** In land condemnation cases, use the location of the tract of land involved

**X. SIGNATURE OF ATTORNEY (OR PRO PER):**  Date 5/23/2012

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

**Key to Statistical codes relating to Social Security Cases:**

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))